

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 20-232 (JRT/KMM)

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUSSELL JASON RAHM et al.,

Defendants.

**GOVERNMENT'S MOTION FOR
EXTENSION OF TIME TO FILE ITS
CONSOLIDATED POST-HEARING
RESPONSE TO DEFENDANTS'
PRETRIAL MOTIONS**

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, Joseph H. Thompson, Harry M. Jacobs, and Melinda A. Williams, Assistant U.S. Attorneys, respectfully submits the following motion for an extension of time in which to file its consolidated post-hearing response to defendants' pretrial motions.

On October 20, 2020, a grand jury returned an indictment charging 43 defendants with conspiracy to commit wire fraud. Dkt. #1. 23 of the 43 defendants have pled guilty. The 20 remaining defendants filed a total of approximately 141 pretrial motions. *See* Dkt. ##885-1059. The government's post-hearing supplemental response to four defendants' suppression motions are currently due on April 28, 2022.

The government respectfully asks for an additional 7 days in which to respond to the defendants' post-hearing pretrial motions. The government has been working on its responses to the motions, but given the number of motions, requests additional time to ensure that its response is helpful to the Court. The government believes that the additional time requested will be adequate for the government to research

and respond to the defendants' motions. Counsel for defendants' who filed the motions at issue do not object to the extension request.

For the reasons set forth above, the government respectfully requests an extension of time in which to respond to defendants' pretrial motions to May 5, 2022.

Dated: April 28, 2022

Respectfully submitted,

ADNREW M. LUGER
United States Attorney

s/ Harry M. Jacobs
BY: JOSEPH H. THOMPSON
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